

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

DIMAS RODRIGUEZ, on behalf of himself  
and all other plaintiffs similarly situated,

Plaintiff,

v.

LEGACY HEALTHCARE FINANCIAL  
SERVICES, LLC and LAGRANGE  
SKILLED NURSING FACILITY LLC d/b/a  
THE GROVE OF LAGRANGE PARK,

Defendants.

Case No. 1:22-cv-04532

Judge: Hon. Robert W. Gettleman

Magistrate Judge: Hon. Susan E. Cox

**PLAINTIFF'S MOTION FOR LEAVE TO FILE EXHIBITS 4, 5 and 7  
TO PLAINTIFF'S RESPONSE TO DEFENDANTS' MOTION TO DISMISS  
THE FIRST AMENDED COMPLAINT UNDER SEAL**

Plaintiff Dimas Rodriguez ("Rodriguez" or "Plaintiff") submits the following Motion for leave to file Exhibits 4, 5 and 7 to Plaintiff's Response to Defendants' Motion to Dismiss the First Amended Complaint, states as follows:

1. On February 25, 2023, this Court entered an Agreed Confidentiality Order. *See* Doc. #29.
2. The Parties anticipated that confidential material would be disclosed as part of the ongoing investigation of and discovery in this matter.
3. Exhibits 4, 5 and 7 to Plaintiff's Response to Defendants' Motion to Dismiss the First Amended Complaint are documents from Legacy Healthcare Financial Services' production that were labeled "Confidential" pursuant the Confidentiality Order.

4. Plaintiff therefore requests, pursuant to Local Rule 26.2, leave to file under seal copies of Exhibits 4, 5 and 7.

WHEREFORE, Plaintiff requests that this Court enter an order allowing Plaintiff to file under seal Exhibits 4, 5 and 7 to Plaintiff's Response to Defendants' Motion to Dismiss the First Amended Complaint.

Dated: April 21, 2023

Respectfully Submitted,  
**Dimas Rodriguez on behalf of himself and all others  
similarly situated,**

By: /s/ John Kunze  
One of Plaintiff's Attorneys

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